

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

LORI FITZGERALD, *et al.*,

Plaintiffs,

v.

JOSEPH WILDCAT SR., *et al.*,

Defendants.

Civil No. 3:20-cv-44-NJM-JCH

**JOINT MOTION FOR PROTECTIVE ORDER**

Plaintiffs and Defendants move this Court for entry of the attached Stipulated Protective Order. In support of this Motion, the Parties state as follows:

1. The Parties expect this case will entail the production of significant documents and information.
2. The Parties agree it is likely that confidential or proprietary financial information, or information that constitutes trade secrets, will be produced as part of the discovery, and that the production and dissemination of such information could be harmful absent appropriate protection.
3. The Parties agree good cause exists for entry of the Protective Order, a copy of which is attached hereto

Based on the agreement of the Parties and for good cause to protect confidential information and facilitate discovery, the Parties respectfully request that the Court enter the attached Protective Order.

DATED: July 18, 2024

Respectfully submitted,

**PLAINTIFFS**

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